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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TIMOTHY J. GREENE, an individual,

Plaintiff,

vs.

PORTFOLIO RECOVERY ASSOCIATES, LLC,
a Delaware limited liability company,

Defendant.

Case No.: 2:16-cv-00641-GMN-VCF

**JOINT DISCOVERY PLAN
AND SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)**

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule of Practice 26-1, the parties, Plaintiff Timothy J. Greene and Defendant Portfolio Recovery Associates, LLC, by and through their respective counsel of record, hereby stipulate to and request that the Court enter the following proposed Joint Discovery Plan and Scheduling Order:

Meeting: Pursuant to Fed. R. Civ. P. 26(f) and LR 26-1, a meeting was held on May 31, 2016 and was attended by:

Trent L. Richards, Esq. of the Bourassa Law Group, counsel of record for Plaintiff,
Timothy J. Greene

Michael R. Ayers, Esq. of Hinshaw & Culbertson LLP counsel of record for
Defendant Portfolio Recovery Associates, LLC.

1 Pre-Discovery Disclosures: The parties hereby stipulate that they shall make their initial
2 disclosures of information required by Fed. R. Civ. P. 26 (a)(1) by **Tuesday, June 14, 2016**, which
3 is *fourteen (14) days* from the Rule 26(f) meeting. No changes need be made to the form or
4 requirements of such disclosures.

5 Areas of Discovery: Discovery will be conducted on all issues including, but not limited
6 to, all claims and defenses within the scope of the pleadings consistent with the Federal Rules of
7 Civil Procedure and the Local Rules of this district.

8
9 1. Discovery Cut-Off Date: Discovery shall take one hundred seventy-nine
10 (179) days, measured from May 2, 2016, which is the date the first defendant answered or
11 otherwise appeared in the case. This does not exceed the one hundred eighty (180) day
12 presumptive outside limit LR 26-1(b)(1) sets for completing discovery. Accordingly, discovery
13 must be commenced in time to be completed by **Friday, October 28, 2016**.

14
15 2. Amending the Pleadings and Adding Parties: The parties shall have until
16 **Friday, July 29, 2016**, to file a[ny] motion[s] to amend the pleadings or to add parties. This is
17 ninety (91) days before the discovery cut-off date and does not exceed the outside limit LR 26-
18 1(b)(2) presumptively sets of not less than ninety (90) days prior to the close of discovery for
19 filing such motions.

20
21 3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts): Disclosure of experts shall
22 proceed according to Fed. R. Civ. P. 26(a)(2), except that:

23 [i] The disclosure of experts and expert reports shall occur on
24 **Monday, August 29, 2016**, which is sixty (60) days before the discovery cut-off date in
25 accordance with LR 26-1(b)(3); and

26 [ii] The disclosure of rebuttal experts and their reports shall occur on
27 **Wednesday, September 28, 2016**, which is twenty-nine (29) days after the initial disclosure of
28

1 experts in accordance with LR 26-1(b)(3).

2 4. Dispositive Motions: The parties shall have until **Friday November 25,**
3 **2016** to file dispositive motion(s). This is twenty-eight (28) days after the discovery cut-off date
4 and does not exceed the outside limit of thirty (30) days following the discovery cut-off date that
5 LR 26-1(b)(4) presumptively sets for filing dispositive motions.
6

7 5. Pretrial Order: The joint pretrial order shall be filed by **Friday, December**
8 **23, 2016**, which is not later than thirty (30) days after the date set for filing dispositive motions in
9 this case in accordance with LR 26-1(b)(5). In the event a timely dispositive motion is filed, the
10 deadline to submit the joint pretrial order shall be suspended until thirty (30) days after the
11 decision on the dispositive motion or further order of the Court.
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13 6. The disclosures required by Fed. R. Civ. P. 26(b)(6) shall be made in the
14 joint pretrial order.

15 7. Alternative Dispute Resolution. The parties hereby certify that they met
16 and conferred about the possibility of using alternative dispute-resolution processes including
17 mediation, arbitration, and if applicable, early neutral evaluation.

18 8. Alternative Forms of Case Disposition. The parties hereby certify that they
19 considered consent to trial by a magistrate judge under 28 U.S. C. 636(c) and Fed. R. Civ. P. 73
20 and the use of the Short Trial Program (General Order 2013-01).
21

22 9. Electronically Stored Information: The parties have not identified any
23 unique electronically stored information issues at this point, but in the event that the parties do
24 encounter such an issue, they agree to meet and confer in good faith to reach a mutual agreement
25 regarding the production of such information.

26 10. Other Items:

27 a. Interim Status Report: The parties shall file the interim status report
28

1 required by LR 26-3 by **Monday, August 29, 2016**. The undersigned counsel certify that they
2 have read LR 26-3 and that this date is no later than sixty (60) days before the discovery cut-off
3 date.

4 b. Settlement. The parties have not discussed settlement at this time.

5 c. Later Appearing Parties: A copy of this discovery plan and
6 scheduling order shall be served on any person served after it is entered or, if additional defendants
7 should appear, within five (5) days of their first appearance. This discovery plan and scheduling
8 order shall apply to such later appearing parties, unless a stipulation of the parties is approved by
9 the Court or the Court, on motion for good cause shown, orders otherwise.
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d. Extensions or Modifications of the Discovery Plan and Scheduling

Order: LR 26-4 governs modifications or extensions of this discovery plan and scheduling order.

Any stipulation or motion must be made not later than twenty-one (21) days before the expiration of the subject deadline and comply fully with LR 26-4.

AGREED AND ACCEPTED:

Plaintiff:

Defendant:

DATED this 1st day of June 2016

DATED this 1st day of June, 2016

BOURASSA LAW GROUP

HINSHAW & CULBERTSON LLP

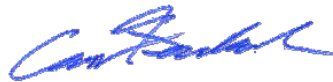
By: /s/ Mark Bourassa

By: /s/ Michael R. Ayers

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Attorneys for Defendant

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE
June 2, 2016

DATED: _____

CASE NO.: 2:16-cv-00641-GMN-VCF